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**UNITED STATES DISTRICT COURT
 DISTRICT OF ARIZONA**

Mi Familia Vota, et al.,
 Plaintiffs,
 v.
 Adrian Fontes, in his official capacity as
 Arizona Secretary of State, et al.,
 Defendants,
 and
 Speaker of the House Ben Toma and Senate
 President Warren Petersen,
 Intervenor-Defendants.

Living United For Change In Arizona, et al.,
 Plaintiffs,

Case No. 2:22-cv-00509-SRB (Lead)

**PLAINTIFFS' RESPONSE TO AND
 MOTION TO OVERRULE
 DEFENDANTS' SPECIFIC
 OBJECTIONS TO DEPOSITION
 DESIGNATIONS**

No. CV-22-00519-PHX-SRB
 No. CV-22-01003-PHX-SRB
 No. CV-22-01124-PHX-SRB
 No. CV-22-01369-PHX-SRB
 No. CV-22-01381-PHX-SRB
 No. CV-22-01602-PHX-SRB
 No. CV-22-01901-PHX-SRB

1 v.

2 Adrian Fontes, in his official capacity as
3 Arizona Secretary of State, et al.,

4 Defendant,

5 and

6 State of Arizona, et al.,

7 Intervenor-Defendants,

8 and

9 Speaker of the House Ben Toma and Senate
10 President Warren Petersen,

11 Intervenor-Defendants.

12 Poder Latinx,

13 Plaintiff,

14 v.

15 Adrian Fontes, in his official capacity as
16 Arizona Secretary of State, et al.,

17 Defendants,

18 and

19 Speaker of the House Ben Toma and Senate
20 President Warren Petersen,

21 Intervenor-Defendants.

22 United States of America,

23 Plaintiff,

24 v.

25 State of Arizona, et al.,

26 Defendants,

27
28

1 and
2 Speaker of the House Ben Toma and Senate
3 President Warren Petersen,

4 Intervenor-Defendants.

5 Democratic National Committee, et al.,
6 Plaintiffs,

7 v.

8 Adrian Fontes, in his official capacity as
9 Arizona Secretary of State, et al.,

10 Defendants,

11 and

12 Republican National Committee,

13 Intervenor-Defendant,

14 and

15 Speaker of the House Ben Toma and Senate
16 President Warren Petersen,

17 Intervenor-Defendants.

18 Arizona Asian American Native Hawaiian
19 And Pacific Islander For Equity Coalition,

20 Plaintiff,

21 v.

22 Adrian Fontes, in his official capacity as
23 Arizona Secretary of State, et al.,

24 Defendants,

25 and

26 Speaker of the House Ben Toma and Senate
27 President Warren Petersen,

28

Intervenor-Defendants.

Promise Arizona, et al.,

Plaintiffs,

v.

Adrian Fontes, in his official capacity as
Arizona Secretary of State, et al.,

Defendants,

and

Speaker of the House Ben Toma and Senate
President Warren Petersen,

Intervenor-Defendants.

1 Pursuant to the Court's direction during trial on November 6, 2023, the
2 Consolidated Plaintiffs bring this Motion respectfully requesting that the Court overrule
3 objections of the State, Attorney General, Republican National Committee, and Legislators
4 (collectively, "Defendants") to specific deposition designations offered by Plaintiffs.
5 Plaintiffs attempted to confer with Defendants regarding the number of objections
6 addressed in the Exhibit A accompanying charts, but were unable to reach any resolution
7 or agreement to narrow Defendants' objections. Plaintiffs had hoped this would be a
8 narrower set after conferring with Defendants, and believe there is still opportunity and
9 room to narrow both objections and designations, and will endeavor to do so with
10 Defendants. But given the deadline, Plaintiffs herein identify their responses to Defendants
11 current outstanding objections.

12 Attached as Exhibit A is Defendants' chart from the Joint Proposed Pre-Trial Order
13 (Dkt. 571-7), modified by adding another column with Plaintiffs' responses to the
14 objections; specifically, Plaintiffs have added the column labeled "Plaintiffs' Response,"
15 which is also highlighted, and removing designations without objection. Plaintiffs'
16 responses refer to specific paragraphs of their previously-filed Motion (Dkt. 624, attached
17 hereto as Exhibit B for convenience) (indicated by, e.g., "*See Motion Section*" in the chart),
18 but also include information for the specific objection(s) in the chart. Plaintiffs also note
19 Defendants' chart from the Joint Proposed Pre-Trial Order, in some instances attributes
20 larger ranges of testimony than Plaintiffs actually designated. The correct designations for
21 review are those highlighted in Plaintiffs' designations filed with the Joint Pre-Trial Order
22 (Dkt. 571-6). Plaintiffs anticipate that the parties will file final designations reflecting
23 agreements of the parties and the Court's rulings at a later date.

1 Dated: November 8, 2023

Respectfully submitted,

2 By /s/ Amit Makker

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of November, 2023, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Amit Makker

Amit Makker